

FILED
Clerk
District Court

DEC 29 2005

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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Attorneys for Plaintiffs Moses T. and Qianyan S. Fejeran

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS

MOSES T. FEJERAN and
QIANYAN S. FEJERAN,

Plaintiffs,

vs.

AVIATION SERVICES (CNMI), LTD.
d.b.a. FREEDOM AIR,

Defendant.

) CIVIL ACTION NO. 05-0033

)
) PLAINTIFFS' PRE-DISCOVERY
) DISCLOSURE STATEMENT

Plaintiffs, by and through their attorneys, pursuant to L.R. 16.2(c)(J)(d) and
Fed.R.Civ.Pro. Rule 26(a), submits the following disclosures:

A. Persons With Potentially Discoverable Information

1. Moses T. Fejeran (will testify as to the circumstances surrounding the accident at question in this suit and the damages that he has incurred)
2. Qianyan S. Fejeran (will testify as to the effect of this accident upon her husband, Mr. Fejeran and the damages she has incurred)
3. As their investigation of potential witnesses is ongoing, Plaintiffs reserve the right to disclose any other persons with potentially discoverable information as soon as is practicable.

B. Description of Relevant Document

1. Plaintiff has available for inspection and copying all documents, data compilations, and tangible things that are in its possession, custody and control as required by

ORIGINAL

1 Rule 26(a) Fed.R.Civ.Pro.

2 2. Various travel related documents including itineraries, boarding passes, tickets
3 and other documents related to the trip at issue in this lawsuit.

4 3. As Plaintiffs investigation of this matter is ongoing, they reserve the right to
5 supplement this disclosure with descriptions of other relevant documents as soon as is
6 practicable.
7

8
9 C. Computation of Damages

10 At the present time, Mr. Fejeran's medical bills and records are being collected.
11 Although these documents were requested from CHC over four months ago, they have yet to be
12 delivered and no response from CHC has been forthcoming. Therefore, it is not possible to
13 submit a computation of damages at the present time.
14

15 D. Insurance Agreement

16 Plaintiff does not know of any such applicable document but assumes one must exist.
17
18

19 Dated: December 15, 2005.

20 O'CONNOR BERMAN DOTTS & BANES
21 Attorney for Plaintiffs Moses T. and
22 Qianyan S. Fejeran
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25 By: 

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